IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

Case No. 22-11068-JTD

Debtors.

(Jointly Administered)
Obj. Deadline: December 9, 2022 at 4:00 p.m.
Hearing Date: December 16, 2022 at 10:00 a.m.

NOTICE OF MOTION

PLEASE TAKE NOTICE that today, Miami-Dade County, Florida, through its undersigned counsel, filed a motion (the "Motion") for relief from the automatic stay (to the extent applicable and to the extent such relief is necessary) to terminate that certain Naming Rights Agreement.

PLEASE TAKE FURTHER NOTICE that objections, if any, to approval of the Motion must (a) be in writing; (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 9, 2022, at 4:00 p.m. (ET)** (the "Objection Deadline"); and (c) served so as to be received on or before the Objection Deadline by the undersigned counsel to Miami-Dade County Florida.

PLEASE TAKE FURTHER NOTICE THAT only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing.

PLEASE TAKE FURTHER NOTICE THAT, IF OBJECTIONS ARE FIELD, A HEARING ON THE MOTION WILL BE HELD ON <u>December 16, 2022, at 10:00 A.M. (ET)</u> BEFORE THE HONORABLE JOHN T. DORSEY, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM #5, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Signature Page Follows

Dated: November 22, 2022 ARMSTRONG TEASDALE LLP

/s/ Eric M. Sutty

Eric M. Sutty (No. 4007) 1008 North Market Street, Third Floor Wilmington, DE 19801 Telephone: (302) 416-9671 Email: esutty@atllp.com

and

GERALDINE BONZON-KEENAN
Miami-Dade County Attorney
Ileana Cruz, Esq. (admitted pro hac vice)
Eduardo W. Gonzalez, Esq.
(admitted pro hac vice)
Assistant County Attorneys
111 N.W. 1st Street, Suite 2810
Miami, FL 33128
Telephone: (305) 375-5151

Email: cao.bkc@miamidade.gov Direct Email: ileanac@miamidade.gov

Counsel for Miami-Dade County, Florida